Remarks/Arguments:

The pending claims are 1-15. Claims 1 and 10 have been amended. No new matter is introduced therein.

Applicant appreciates the Examiner's indication that claims 10 and 11 would be allowable if rewritten in independent form. In addition to the indication of allowance of claim 10, the Office Action rejected claim 10 under 35 U.S.C. § 112, second paragraph. Claim 10 has now been amended to include the features of claim 6. Claim 10 has also been amended to remove language upon which the § 112 rejection was based. Accordingly, claim 10, and dependent claim 11, are now in condition for allowance.

Paragraph 5 of the Office Action has rejected claims 1-5 under 35 U.S.C. § 103(a) as unpatentable over Kutsumi et al. (U.S. Patent No. 5,353,221) in view of Su et al. (U.S. Patent No. 5,418,717). Applicant incorporates by reference the arguments he presented in the Amendment filed on December 16, 2004. Amended claim 1 recites, in part:

> storing means of storing language rules which are obtained by training grammatical or semantic restriction rules for a word or a word string from a training database including a parallel translation corpus in which a source language sentence that is input in a form of speech or text, and that has undergone a corresponding target language transference, is automatically paired with a target language sentence comprising the source language sentence that has undergone the corresponding language transference.

Accordingly, amended claim 1 recites, in part, "A language transferring apparatus. . . in which a source language sentence that is input. . . is automatically paired with a target language sentence. . . ."

The feature of <u>automatically</u> pairing a source language sentence with a target language sentence is not disclosed or suggested in Kutsumi. Instead, Kutsumi teaches away from this feature. Specifically, column 16, lines 50-55 shows that Kutsumi requires user input:

> in a case that the parallel disposition of words or phrases may be erroneously recognized because of the ambiguous modifying structure of the input sentence, the operator uses the keyboard 14 to give an

instruction for adding the parallel word or phrase specifying symbol to the input sentence.

In view of this difference between amended claim 1 and Kutsumi, amended claim 1, and dependent claims 2-5, are not subject to rejection under 35 U.S.C. § 103(a) as unpatentable over Kutsumi in view of Su.

Claims 6-9, 12 and 13 have been rejected under 35 U.S.C. § 103(a) as unpatentable over Kutsumi in view of McCarley (U.S. Patent No. 6,349,276). The rejection is respectfully traversed.

Again, applicant incorporates by reference the arguments he presented in the Amendment filed on December 16, 2004. The last paragraph on page 5 of the Office Action relies upon a language transfer corpus in McCarley, presumably a language transfer corpus such as Block 112. The Office Action generally contends that the language transfer corpus in McCarley would have made it obvious to use translation based dictionaries in Kutsumi because the language transfer corpus would provide a system that could handle multiple language translations. Applicant respectfully disagrees.

Claim 6 recites, in part, that "the language transference, when a source language sentence is input, matches the input sentence with the corresponding partial phrases stored in said phrase dictionary." It is important to recognize that McCarley and Kutsumi are <u>not</u> in the same field of endeavor. Kutsumi "relates to a translation machine for outputting a natural translated sentence, more particularly the translation machine which is capable of translating a sentence with an ambiguous parallel disposition of words and/or phrases into a correct sentence." (col. 1, lines 9-13). That is, Kutsumi relates to a translation machine. McCarley relates to "a system and method for information retrieval systems employing a transfer corpus to retrieve information based on a query and information in different languages." (col. 1, lines 14-18) McCarley relates to information retrieval. More specifically, McCarley relates to retrieving documents in one language when the document data base is queried in a different language. (col. 4, lines 46-61). Because these patents are directed to significantly different fields of endeavor, there would be no motivation for a person skilled in the translation machine art disclosed in Kutsumi to consider information in the document retrieval art disclosed in McCarley.

In addition, transfer corpus 112 in McCarley does not provide a system recited in claim 6 wherein

> the language transference, when a source language sentence is input, matches the input sentence with the corresponding partial phrases stored in said phrase dictionary.

Although Block 112 shown in Figure 3 of McCarley is labeled in the Figure as a "transfer corpus," McCarley's specification states that it is a collection of documents. (col. 6, lines 47-48). There is no disclosure in McCarley that its Block 112 transfer corpus performs translation from one language to another language. There is also no disclosure that McCarley's Block 112 transfer corpus stores phrases for language comparison or transference. There is also no disclosure that McCarley's Block 112 transfer corpus "matches the input sentence with the corresponding partial phrases stored in said phrase dictionary" as recited in claim 6. Block 112 in McCarley is not a phrase dictionary storing partial phrases as defined in claim 6. Although Figure 4 of McCarley shows a machine translation Block 210, there is no disclosure that it operates as recited in claim 6.

For all of the above reasons, claim 6 and dependent claims 7-9, 12, and 13 are not subject to rejection under 35 U.S.C. § 103(a) as unpatentable over Kutsumi in view of McCarley.

Paragraph 1 of the previous Office Action dated September 16, 2004 objected to claim 14 as being in improper form because, in the view of the USPTO, it was a multiple dependent claim that depended from a multiple dependent claim. Applicant's December 16, 2004 Amendment pointed out that claim 14 had previously been amended in a Preliminary Amendment; but inadvertently stated that the Preliminary Amendment had been filed on December 4, 2004. The Preliminary Amendment had, instead, been filed on December 4, 2000. Because the December 4, 2000 Preliminary Amendment amended claim 14 well before the September 16, 2004 Office Action, there was no basis for the objection to claim 14 raised by the PTO in the September 16, 2004 Office Action. As Amended in the December 4, 2000 Preliminary Amendment, claim 14 depends from claims 1-4 and from 6-12, none of which are multiple dependent claims. Since claims 1-4 and 6-12 are not subject to rejection for the reasons stated above, claim 14 is also not subject to rejection.

Applicant's December 16, 2004 Amendment also added new claim 15. The current Office Action dated June 3, 2005 does not consider claim 15 either in the Office Action Summary or in the Detailed Action. Applicant incorporates by reference the arguments he presented in his December 16, 2004 Amendment regarding the patentability of claim 15.

For all of the above reasons, claims 1-15 are now in condition for allowance. Reconsideration and allowance of all pending claims are respectfully requested.

Respectfully submitted,

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